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17 **UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 20 VPN.COM LLC,

21 Plaintiff,

22 vs.

23 24 GEORGE DIKIAN;

25 QIANG DU; and

26 JOHN DOE

27 Defendants.

28 Case No: 2:22-cv-04453-AB-MAR

**DECLARATION OF**  
**MICHAEL D. CILENTO, ESQ.**

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**DECLARATION OF MICHAEL CILENTO**

1 I, Michael D. Cilento, Esq., declare as follows:

2 1. I make this Declaration upon my own personal knowledge and the  
3 records, files, and knowledge of my law firm, Lewis & Lin, LLC, counsel to the  
4 Plaintiff VPN.COM LLC (“VPN”) in this action.

5 2. VPN filed this action via Complaint on June 29, 2022.

6 3. VPN thus, pursuant to FRCP 4(m) serve Defendants by September  
7 27, 2022 (90 days from the Complaint being filed).

8 4. My law firm and I performed investigations into the matters stated  
9 in the Complaint as well as into the Defendants George Dikian (“Dikian”) and  
10 Qiang Du (“Du”) both before and after the Complaint in this action was filed.

11 5. As part of those investigations, we did both public and paid  
12 background searches on Dikian in order to determine where Dikian resides or  
13 otherwise to find a suitable address to serve process on Dikian. Those searches  
14 yielded only one known possible physical address for Dikian: 1219 Vine Street,  
15 Los Angeles, CA, 90038.

16 6. Based on the above, we hired a process server to serve Dikian at  
17 the Vine Street address. The process server attempted service on July 11, 2022,  
18 but the address was occupied by an unknown business, and the individual the  
19 process server spoke to said that George Dikian was unknown to the individual.

7. Following this failed service attempt, we again performed further searches to determine another viable address to serve Dikian, but we were unsuccessful.

8. Similarly, as to Du, my law firm and I, as well as VPN, have been unable to determine an exact location within Hong Kong where Du resides.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25<sup>th</sup> day of August, 2022 in Brooklyn, New York, USA.

Executed this 25<sup>th</sup> day of August, 2022 in Brooklyn, New York, USA.

  
Michael Gilante

# Michael Cilento